

K&L GATES

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By ECF

The Honorable J. Paul Oetken
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Van Elzen v. Global Strategy Group, LLC and American Directions Research Group, Inc.*, No. 1:20-cv-03541

Dear Judge Oetken:

We represent Defendant American Directions Research Group, Inc. (“American Directions”) in the above-captioned matter. We write pursuant to the Court’s Individual Practices in Civil Cases, with the consent of Plaintiff to request an extension of time to answer, move, or otherwise respond to the Class Action Complaint (“Complaint”) that was filed in the above-referenced civil action on May 6, 2020.

Defendant American Directions was served with the Summons and Complaint on June 10, 2020. We understand that on May 22, 2020, Defendant Global Strategy Group, LLC received a request for waiver of service from the plaintiff, and must thereby respond to the Complaint on or before July 22, 2020. Plaintiff’s counsel has agreed to extend the deadline for American Direction’s response to the Complaint to July 22, 2020 in order to give American Directions ample time to review the claim and to synchronize the response dates for the Defendants. Accordingly, we respectfully request an extension of time from July 1, 2020 to July 22, 2020 to answer, move, or otherwise respond to the Complaint. This is the first request for an extension of time to respond to the Complaint.

Thank you for your consideration of this request.

Respectfully Submitted,

/s/ Tara Pehush

cc: All counsel of Record (by ECF)